

April 29, 2019

VIA E-MAIL

Pamela Travis
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U.S. EPA, Region 6
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Re: Status of HMC's CERCLA Equivalency Efforts

Dear Ms. Travis,

To help facilitate discussions at our meeting scheduled on May 1, 2019, we have summarized below Homestake Mining Company's ("HMC") understanding of the status of the equivalency process at the Grants Reclamation Project ("GRP").

EQUIVALENCY PROJECT STATUS

Tasks Completed:

- **Equivalency Package:** CERCLA Equivalency of Investigation & Remediation Efforts at the Homestake Mining Company of California Uranium Mining Facility—Grants, New Mexico (the "Equivalency Package") submitted to EPA 11/25/2013.
- **Draft ARARs Table & Memo:** Draft ARARs table submitted to EPA approximately 11/2013; memo providing context and explanation of the process used to identify ARARs for Grants submitted to EPA on 12/6/2013.
- **Draft Equivalency RI Report:** Draft Remedial Investigation Report provided to EPA, 11/20/2014. Included the following:
 - Baseline Human Health Risk Assessment ("HHRA") completed by EPA for residential receptors outside the GRP facility boundaries;
 - Site conceptual model for human exposure, baseline HHR for receptors inside the GRP facility boundaries and Land Treatment Areas;
 - Streamlined ecological risk assessment and associated site conceptual exposure model ("SLERA").

- **Draft Administrative Order on Consent:** EPA and HMC exchanged drafts of the AOC (for Equivalency RI) in approximately 11/2015; negotiated terms over the following months, and HMC believes we reached tentative agreement on many terms;
- **Statement of Work:** SOW exchanged with EPA in approximately 11/2013, our notes indicate that HMC and EPA reached an agreement on the SOW.
- **Identification of Candidate Technologies Memo for Treatability Studies:** SOW called for an "Identification of Candidate Technologies Memorandum for Treatability Studies." HMC submitted a draft to EPA approximately 2/2015.
- **EPA provided comments on Draft Equivalency RI Report:** EPA's commented on the draft Equivalency RI Report.
- **EPA comment discussions:** HMC and EPA met in August 2015 to work through EPA comments and eventually reached agreement on many items setting aside comments related to the background standards and hydrology.
- **Revised Draft Equivalency RI Report:** Responding to the discussions of August 2015 and the comments from EPA, HMC submitted a revised RI Report on 6/22/2016.

Consistent with the foregoing, we have recently provided EPA the following documents:

- Equivalency RI Report comment chart prepared by EPA;
- 6/22/2016 version of the Equivalency RI Report; and
- 2019 Work Plan for gathering additional data for the background analysis.

Additionally, to ensure you have a complete administrative record to date, we provide with this letter the following documents:

- Draft ARARs;
- Most recent version of the AOC (according to our files);
- Negotiated SOW; and
- Identification of Candidate Technologies Memo for Treatability Studies.



To Be Completed:

- Discuss with EPA its comments on revised Equivalency RI Report 6/22/2016;
- Finalize ARARs;
- Revise Equivalency RI Report and augment with more recent data and sources, and address remaining EPA comments;
- Finalize Equivalency RI Report;
- Finish Development and Screening of Remedial Alternatives Technical Memo;
- Negotiate and finalize AOC;
- Update Identification of Candidate Technologies Memo for Treatability Studies (if necessary);
- Finish Treatability Study Evaluation Reports to EPA;
- Draft Alternatives Development and Screening Memo;
- Complete Feasibility Study (Discuss how to address this in light of the NRC Corrective Action Plan);
- Develop Proposed Plan;
- Draft the Record of Decision; and
- Negotiate Consent Decree.

We look forward to meeting with EPA and appreciate the opportunity to discuss the path forward to re-engage in the equivalency process.

Best Regards,

Kevin R. Murray